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October 24, 2023

Via ECF

Hon. Paul G. Gardephe
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 705
New York, NY 10007

Re: *Helayne Seidman v. Valnet Inc.*
Case No: 1:23-cv-06929-PGG

Dear Judge Gardephe:

We are the attorneys for Plaintiff Helayne Seidman ("Plaintiff") in this matter. Pursuant to Rule I(E) of Your Honor's Individual Practices, we write to respectfully request an adjournment of the initial conference date until at least 14 days after Defendant Valnet, Inc. ("Defendant")'s deadline for responding to the Complaint. The parties further request permission to appear at the initial conference via teleconference or video conference.

Defendant executed a waiver of service on August 24, 2023, setting November 22, 2023 as Defendant's deadline to answer the Complaint (ECF No. 11). The initial conference is currently set for November 9, 2023. Defendant consents to this request and no adjournments or extensions were previously sought.

The parties propose the following alternative conference dates: Thursday, December 7, 2023, or Thursday, December 21, 2023.

We thank the Court for its time and consideration of this request.

MEMO ENDORSED: The conference currently scheduled for November 9, 2023 is adjourned to **December 7, 2023 at 10:00 a.m.**

Respectfully submitted,

/s/ Renee J. Aragona
Renee J. Aragona

SO ORDERED.

cc

A handwritten signature in black ink, appearing to read "Paul G. Gardephe". The signature is written in a cursive, flowing style.

Paul G. Gardephe
United States District Judge
Dated: October 27, 2023